DOCKET NO. D-1976-097-3

DELAWARE RIVER BASIN COMMISSION

Exide Technologies
Industrial Wastewater treatment Plant Renewal and
Stormwater Treatment Plant Modification
Muhlenberg Township, Berks County, Pennsylvania

PROCEEDINGS

This docket is issued in response to an Application submitted to the Delaware River Basin Commission (DRBC or Commission) by URS Corporation on behalf of Exide Technologies (Exide) on December 24, 2012 (Application), for renewal of an industrial wastewater treatment plant (IWTP) and review of a stormwater treatment plant (SWTP) modification. The Pennsylvania Department of Environmental Protection (PADEP) issued National Pollutant Discharge Elimination System (NPDES) Permit No. PA0014672 on December 17, 2010 for the discharges associated with the facility. PADEP approval of a Water Quality Management (WQM) permit for the project is pending.

The Application was reviewed for approval under Section 3.8 of the *Delaware River Basin Compact*. The Berks County Planning Commission has been notified of pending action. A public hearing on this project was held by the DRBC on March 5, 2013.

A. DESCRIPTION

1. Purpose. The purpose of this docket is to 1) renew the approval of the docket holder's existing IWTP and its associated discharge; and 2) renew and approve a modification to the docket holder's existing 0.4 million gallon per day (mgd) SWTP and its associated discharge. The modification consists of adding an 828,900-gallon above ground storage tank to the existing SWTP. The project does not propose modifications to the existing IWTP, which is designed to treat 0.7 mgd, but permitted to discharge up to 0.25 mgd. The docket holder also is requesting to continue a TDS determination of 6,000 mg/l (monthly average) and 7,500 mg/l (daily maximum) for the existing IWTP.

On January 8, 2013, the DRBC Executive Director approved an emergency certificate for this project. The emergency certificate granted permission to Exide to proceed with the construction of this project, pursuant to Section 2.3.9.B of the *Administrative Manual, Part II, Rules of Practice and Procedure* (Rules).

2. Location. The IWTP and SWTP are associated with the existing Exide battery manufacturing facility, located on Spring Valley Road and Nolan Street in Muhlenberg Township, Berks County, Pennsylvania. The existing SWTP and IWTP will continue to discharge to the Schuylkill River at River Mile 92.47 - 78.29 (Delaware River – Schuylkill River) via an existing stormwater conveyance system. The combined SWTP and IWTP effluent discharges to an existing pipe dedicated to Exide, which discharges to an existing City of Reading stormwater pipe, which outfalls to the Schuylkill River. The Exide facility also features a stormwater overflow outfall, which will continue to discharge untreated stormwater runoff to the Bernhart Creek during large precipitation events.

The project is located in the Schuylkill River Watershed as follows:

OUTFALL NO.	LATITUDE (N)	LONGITUDE (W)
001 (combined)	40° 22’ 44”	75° 54’ 51”
002 (stormwater overflow)	40° 22’ 44”	75° 54’ 51”

NPDES permit No. PA0014672 requires separate effluent monitoring and limits for the SWTP treated effluent and the IWTP treated effluent prior to combining for discharge via existing Outfall No. 001. The monitoring points are located as flows:

MONITOING POINT NO.	LATITUDE (N)	LONGITUDE (W)
101 (IWTP)	40° 21’ 43”	75° 56’ 20”
201 (SWTP)	40° 22’ 53”	75° 54’ 42”

3. Area Served. The docket holder’s IWTP and SWTP will continue to receive wastewater and stormwater flows from the Exide site. For the purpose of defining the Area Served, Section B (Type of Discharge) and D (Service Area) of the docket holder’s Application are incorporated herein by reference, to the extent consistent with all other conditions contained in the DECISION Section of this docket.

4. Physical features.

a. Design criteria. The existing IWTP is designed to treat up to 0.7 mgd of industrial process wastewater generated by the docket holder’s battery smelting plant. The PADEP and the Commission have based effluent limits for the IWTP discharge on a monthly average discharge of 0.25 mgd. Process wastewaters originate in battery breaker, smelter and remanufacturing operations. Battery acid is also treated at the IWTP, as part of the neutralization process. The IWTP also treats non-contact cooling water, stormwater, and leachate. The leachate is pumped to the IWTP from the docket holder’s inactive, on-site landfill. The existing

SWTP is hydraulically designed to treat 0.75 mgd of stormwater generated at the site. Effluent limits for the SWTP discharge are based on an average monthly flow of 0.4 mgd. The SWTP is designed to remove lead and other heavy metals from contaminated stormwater runoff. Existing storage for the SWTP is 1.55 million gallons.

The treated SWTP effluent and treated IWTP effluent combine prior to discharge to an existing pipe dedicated to Exide, which discharges to an existing City of Reading stormwater pipe, which outfalls to the Schuylkill River, referred to as Outfall 001. Stormwater runoff in excess of the storage and treatment capacity of the existing SWTP bypasses the SWTP and discharges to the Bernhart Creek via existing Outfall No. 002.

The proposed project to add a storage tank to the SWTP will increase the overall storage capacity of the existing SWTP in order to enable the facility to capture and store the stormwater runoff volume generated by the Exide site during the design ten-year frequency rainfall event, for conveyance to the SWTP. No modifications to the existing IWTP are proposed.

Stormwater runoff in excess of the proposed modified storage capacity of the SWTP will continue to bypass the SWTP and discharge to the Bernhart Creek via existing Outfall No. 002.

b. **Facilities**. The existing facilities and water uses/discharges are described as follows:

IWTP: The existing IWTP consists of several advanced treatment processes to treat various waste streams, which are necessary to meet the BAT requirements for this industrial classification. The facilities include primary and secondary clarification tanks, equalization tanks, chemical mixing units, primary and secondary neutralization tanks, a sludge holding tank, a sludge thickening tank, sludge plate filter presses, and a sludge decant reaction tank.

SWTP: The existing SWTP consists of a collection sump/pump station, two (2) existing above-ground storage/equalization tanks with a combined capacity of 1.55 million gallons, and a multi-media filter system consisting of five (5) vessels of multi-media filter units designed to operate in parallel.

The project proposes to add an additional 828,900-gallon above-ground storage tank to the existing SWTP in order to capture and store the stormwater runoff volume generated by the Exide site during the design ten-year frequency rainfall event, for conveyance to the SWTP. The total storage capacity of the SWTP will increase to 2.38 million gallons.

Prior facilities and processes for the IWTP and SWTP have been described in DRBC Docket Nos. D-1976-097-1 and D-1976-097-2, approved by the DRBC on February 23, 1977 and December 8, 2010, respectively.

The IWTP and SWTP are located outside the 100-year floodplain and therefore all tanks and major processes are above the 100-year flood elevation.

IWTP sludge filter press cake will continue to be hauled off-site by a licensed hauler for deposit at a State-approved facility.

The docket holder also is requesting to continue a TDS determination of 6,000 mg/l (average monthly) and 7,500 mg/l (daily maximum) for the existing discharge from the IWTP (Monitoring Point No. 101).

c. Water withdrawals. The potable and process water supply at the battery smelting plant is from Muhlenberg Township Authority wells described in detail in Docket No. D-2001-30 CP, which was approved on February 6, 2002. Process water supply was once obtained from Bernhart Creek and a nearby unnamed spring, as described in DRBC Docket No. D-76-97, approved by DRBC on February 23, 1977, but these sources are no longer utilized. This docket does not approve any withdrawal from Bernhart Creek or the unnamed spring.

d. NPDES Permit / DRBC Docket. NPDES Permit No. PA0014672 was issued by the PADEP on December 17, 2010 and contains effluent limitations for discharge of wastewater and stormwater to waters classified by the PADEP as Warm Water/ Migratory Fishery (WWF/MF) at the following locations: 1) Monitoring Point No. 101 (treated IWTP effluent, based on a flow of 0.25 mgd); 2) Monitoring Point No. 201 (treated SWTP effluent, based on a flow of 0.4 mgd); and 3) Outfall No. 002 (untreated stormwater overflow).

The following average monthly effluent limits are among those listed in the NPDES Permit for Monitoring Point No. 101 (IWTP) and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE A-1: DRBC Parameters Included in NPDES Permit for the IWTP discharge

MONITORING POINT 101 (IWTP)		
PARAMETER	**LIMIT**	**MONITORING**
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	30 mg/l	As required by NPDES Permit
CBOD (5-Day at 20^{o} C)	25 mg/l	As required by NPDES Permit
Ammonia Nitrogen	5.0 mg/l	As required by NPDES Permit
Total Dissolved Solids*	6,000 mg/l (monthly average) 7,500 mg/l (daily maximum)	As required by NPDES Permit

* See DECISION Condition II.u.

The following average monthly effluent limits and monitoring requirements for Monitoring Point No. 101 (IWTP) are for DRBC parameters not listed in the NPDES Permit.

EFFLUENT TABLE A-2: DRBC Parameters Not Included in NPDES Permit for the IWTP discharge

MONITORING POINT NO. 101 (IWTP)		
PARAMETER	**LIMIT**	**MONITORING**
Influent CBOD (5-Day at 20^{o} C)	Monitor & Report	Monthly

The following average monthly effluent limits are among those listed in the NPDES Permit for Monitoring Point No. 201 (SWTP) and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE A-3: DRBC Parameters Included in NPDES Permit for the SWTP discharge

MONITORING POINT NO. 201 (SWTP)		
PARAMETER	**LIMIT**	**MONITORING**
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	30 mg/l	As required by NPDES Permit

The following average monthly effluent limits and monitoring requirements for Monitoring Point No. 201 (SWTP) are for DRBC parameters not listed in the NPDES Permit.

EFFLUENT TABLE A-4: DRBC Parameters Not Included in NPDES Permit for the SWTP discharge

MONITORING POINT NO. 201 (SWTP)		
PARAMETER	**LIMIT**	**MONITORING**
Influent CBOD (5-Day at 20^{o} C)	Monitor & Report	Monthly
CBOD (5-Day at 20^{o} C)	30 mg/l	Monthly
Ammonia Nitrogen	20 mg/l	Monthly
Total Dissolved Solids*	1,000 mg/l	Monthly

* See DECISION Condition II.u.

The following average monthly effluent limits and monitoring requirements are among those listed in the NPDES Permit for Outfall 002 (untreated stormwater overflow) and meet or are more stringent than the effluent requirements of the DRBC.

EFFLUENT TABLE A-5: DRBC Parameters Included in NPDES Permit for the stormwater overflow to Bernhart Creek

OUTFALL NO. 002 (Stormwater overflow discharge to Bernhart Creek)		
PARAMETER	**LIMIT**	**MONITORING**
pH (Standard Units)	6 to 9 at all times	As required by NPDES Permit
Total Suspended Solids	Monitor & Report	As required by NPDES Permit
Total Dissolved Solids*	Monitor & Report	As required by NPDES Permit

* See DECISION Condition II.u.

e. **Cost**. The overall cost of this project is estimated to be $487,000.00.

B. FINDINGS

The purpose of this docket is to 1) renew the approval of the discharge of up to 0.25 mgd from the docket holder's existing 0.7 mgd IWTP; and 2) renew and approve a modification to the docket holder's existing 1.1 mgd SWTP and its associated discharge. The modification consists of adding an 828,900-gallon above ground storage tank to the existing SWTP. No modifications to the existing IWTP are proposed. The docket holder is also requesting to continue a TDS determination of 6,000 mg/l (monthly average) and 7,500 mg/l (daily maximum) for the existing IWTP.

Project History

In 1997, Exide was directed by PADEP in a stipulation of settlement to store the first 277,000 gallons of stormwater runoff volume generated by the Exide site during rainfall events (the "first flush" of stormwater). The 1997 Stipulation of Settlement was proceeded by a Consent Order Agreement (COA) between PADEP and Exide dated December 1, 2008, and replaced with a new COA on May 20, 2011. In the COA, Exide agreed to construct an additional storage tank in order to enable the SWTP to capture and treat the stormwater runoff volume generated during the Exide site during the ten-year frequency rainfall event, which is calculated as approximately 2.0 million gallons. The 2011 COA directs Exide to construct the additional storage tank for the SWTP by March 1, 2013. The proposed project fulfills that agreement and brings the storage capacity of the SWTP to approximately 2.38 million gallons. Although Exide and DRBC staff were aware that the additional storage tank was required according to the COA, the final design for the additional storage tank was not submitted as part of the application for the previous docket approval (Docket No. D-1976-097-2), and therefore the additional storage tank was not approved by the in Docket No. D-1976-097-2. Docket No. D-1976-097-2 required Exide to submit an application to the Commission and be granted approval for the construction of the additional storage tank for the SWTP prior to going out for bid (See Condition II.m. of Docket No. D-1976-097-2).

The Application included a request for emergency approval for the project pursuant to Section 2.3.9.B of the Administrative Manual, Part II, Rules of Practice and Procedure (Rules). Exide requested emergency approval in order to meet the March 1, 2013 deadline (included in the 2011 COA) for construction of the additional storage tank, which will enable the SWTP to prevent untreated stormwater runoff generated by the Exide site during rainfall events up to the design ten-year event, from draining directly to the Bernhart Creek or the Schuylkill River. The Commission's Executive Director granted an Emergency Certificate on January 8, 2013 for the project. The certificate authorized Exide to proceed with the construction and operation of the project at its own risk, and stated that the approval granted by the certificate did not "constitute a final decision of the Commission, nor does it bind the Commission in any way to approve the project, which remains subject to final Commission action after full review and a public hearing". This docket approval constitutes the final decision of the Commission.

TDS Determination

Section 3.10.4.D.2 of the DRBC *Water Quality Regulations* (*WQR*) includes the Commission's basin-wide TDS effluent concentration limit of 1,000 mg/l. The Commission's basin-wide in-stream TDS criteria is that the receiving stream's resultant TDS concentration be less than 133% of the background (WQR Section 3.10.3.B.1.b.) and the receiving stream's resultant TDS concentration be less than 500 mg/l (WQR Section 3.10.3.B. 2.). The discharge is required to comply with the more stringent of the above in-stream criteria.

The 133% of the background TDS requirement is for the protection of aquatic life. The 500 mg/l TDS requirement is to protect the use of the receiving stream as a drinking water source. The EPA's Safe Drinking Water Act's secondary standard for TDS is 500 mg/l.

The Commission approved a monthly average and daily maximum TDS variance of 6,000 mg/l and 7,500 mg/l, respectively, in a letter dated September 12, 1997 for the docket holder's IWTP. TDS is generated from the battery manufacturing process. The previous docket (Docket No. D-1976-097-2) continued approval of the monthly average and daily maximum TDS effluent limitation of 6,000 mg/l and 7,500 mg/l, respectively, for the IWTP discharge.

The estimated $Q_{7\text{-}10}$ flow of the Schuylkill River immediately upstream of the Reading stormwater conduit discharge is 198 cfs (128 mgd). The docket holder's previous correspondence with the Commission indicated that the background TDS concentration for the Schuylkill River immediately upstream of the Reading stormwater conduit discharge during $Q_{7\text{-}10}$ flow conditions is estimated to be 387 mg/l (calculated using data collected from 2000 to 2006).

Commission staff calculated that at a discharge flow of 0.25 mgd from the IWTP (Monitoring Point No. 101) and a maximum daily concentration of 7,500 mg/l of TDS at $Q_{7\text{-}10}$ conditions plus a flow of 0.4 mgd from the SWTP (Monitoring Point No. 201) at a maximum daily docketed concentration of 1,000 mg/l of TDS at $Q_{7\text{-}10}$ conditions, result in a combined TDS concentration of 3,500 mg/l from the two sources. The combined flow from the IWTP and SWTP result in an in-stream TDS concentration of 402.7 mg/l, which satisfies both the 500 mg/l in-stream EPA drinking water standard and 133% of background for the protection of aquatic life.

Commission staff also took into consideration that a SWTP discharge may be unlikely when flow in the Schuylkill River is at or near $Q_{7\text{-}10}$ conditions. With a maximum daily concentration of 7,500 mg/l of TDS and a flow of 0.25 mgd from the IWTP, the resultant in-stream TDS concentration of the Schuylkill River without discharge from the SWTP is 400.9 mg/l, which also satisfies both the 500 mg/l in-stream EPA drinking water standard and 133% of background for the protection of aquatic life.

Therefore, the TDS effluent limitations for the IWTP discharge (Monitoring Point No. 101) of 6,000 mg/l (monthly average) and 7,500 mg/l (daily maximum) are continued.

The docket holder has informed the Commission that they will be shutting down the battery manufacturing portion of the facility in the near future. As a result, the TDS variance may no longer be necessary at the time of the next docket renewal. Therefore, DECISION Condition II.x. of this docket requires the docket holder to submit a TDS Questionnaire with the renewal application for this docket if the docket holder requests to continue a TDS variance to the Commission's 1,000 mg/l basin-wide TDS limit for the IWTP discharge.

Other

Near the combined IWTP/SWTP outfall, the Schuylkill River has an estimated seven-day low flow with a recurrence interval of ten years ($Q_{7\text{-}10}$) of 128 mgd (198 cfs). The ratio of this low flow to the combined IWTP and SWTP flow is 197 to 1.

The nearest surface water intake of record for public water supply downstream of the project discharge is operated by the City of Pottstown, approximately 12 river miles distant.

The project does not conflict with the Comprehensive Plan and is designed to prevent substantial adverse impact on the water resources related environment, while sustaining the current and future water uses and development of the water resources of the Basin.

The limits in the NPDES Permit are in compliance with Commission effluent quality requirements, where applicable.

The project is designed to produce a discharge meeting the effluent requirements as set forth in the Commission's *WQR*.

C. DECISION

I. Effective on the approval date for Docket No. D-1976-097-3 below, the project described in Docket D-1976-097-2 is terminated and replaced by Docket No. D-1976-097-3 to the extent that it is not included in Docket No. D-1976-097-3.

II. The project and appurtenant facilities as described in the Section A "Physical features" of this docket are approved pursuant to Section 3.8 of the *Compact*, subject to the following conditions:

a. Docket approval is subject to all conditions, requirements, and limitations imposed by the PADEP in its NPDES permit and WQM permit, and such conditions, requirements, and limitations are incorporated herein, unless they are less stringent than the Commission's. Commission approval of this docket is contingent on the PADEP's approval of the WQM permit.

b. The facility and operational records shall be available at all times for inspection by the DRBC.

c. The facility shall be operated at all times to comply with the requirements of the *WQR* of the DRBC.

d. The docket holder shall comply with the requirements contained in the Effluent Tables in Section A.4.d. of this docket. The docket holder shall submit the required monitoring results directly to the DRBC Project Review Section. The monitoring results shall be submitted annually, absent any observed limit violations, by January 31. If a DRBC effluent limit is violated, the docket holder shall submit the result(s) to the DRBC within 30 days of the violation(s) and provide a written explanation that states the action(s) the docket holder has taken to correct the violation(s) and protect against any future violations.

e. Except as otherwise authorized by this docket, if the docket holder seeks relief from any limitation based upon a DRBC water quality standard or minimum treatment requirement, the docket holder shall apply for approval from the Executive Director or for a docket revision in accordance with Section 3.8 of the *Compact* and the *Rules of Practice and Procedure*.

f. If at any time the receiving treatment facilities prove unable to produce an effluent that is consistent with the requirements of this docket approval, no further connections shall be permitted until the deficiency is remedied.

g. Nothing herein shall be construed to exempt the docket holder from obtaining all necessary permits and/or approvals from other State, Federal or local government agencies having jurisdiction over this project.

h. The discharge of wastewater shall not increase the ambient temperatures of the receiving waters by more than 5°F, nor shall such discharge result in stream temperatures exceeding 87°F.

i. Sound practices of excavation, backfill and reseeding shall be followed to minimize erosion and deposition of sediment in streams.

j. Within 10 days of the date that construction of the project has started, the docket holder shall notify the DRBC of the starting date and scheduled completion date.

k. Within 30 days of completion of construction of the approved project, the docket holder is to submit to the attention of the Project Review Section of DRBC a Construction Completion Statement ("Statement") signed by the docket holder's professional engineer for the project. The Statement must (1) either confirm that construction has been completed in a manner consistent with any and all DRBC-approved plans or explain how the as-built project deviates from such plans; (2) report the project's final construction cost as such cost is defined by the project review fee schedule in effect at the time the application was made; and (3) indicate the date on which the project was (or is to be) placed in operation. In the event that the final project cost exceeds the estimated cost used by the docket holder to calculate the DRBC project review fee, the statement must also include (4) the amount of any outstanding balance owed for DRBC review. The outstanding balance will equal the difference between the fee paid to the

Commission and the fee calculated on the basis of the project's final cost, using the formula and definition of "project cost" set forth in the DRBC's project review fee schedule in effect at the time application was made.

l. The facility modifications shall be completed within three years of approval of this docket or the docket holder shall demonstrate to the Executive Director that it has expended substantial funds (in relation to the cost of the project) in reliance upon this docket approval. If the modifications have not been completed within three years of Docket Approval and the docket holder does not submit a cost analysis demonstrating substantial funds have been expended, Commission approval of the modifications to the facility shall expire. If the docket expires under this condition, the docket holder shall file a new application with the Commission and receive Commission approval prior to initiating construction of any modifications.

m. The docket holder is permitted to treat and discharge wastewaters as set forth in the Area Served Section of this docket, which incorporates by reference Sections B (Type of Discharge) and D (Service Area) of the docket holder's Application to the extent consistent with all other conditions of this DECISION Section.

n. The docket holder shall make wastewater discharge in such a manner as to avoid injury or damage to fish or wildlife and shall avoid any injury to public or private property.

o. No sewer service connections shall be made to newly constructed premises with plumbing fixtures and fittings that do not comply with water conservation performance standards contained in Resolution No. 88-2 (Revision 2).

p. Nothing in this docket approval shall be construed as limiting the authority of DRBC to adopt and apply charges or other fees to this discharge or project.

q. The issuance of this docket approval shall not create any private or proprietary rights in the waters of the Basin, and the Commission reserves the right to amend, suspend or rescind the docket for cause, in order to ensure proper control, use and management of the water resources of the Basin.

r. Unless an extension is requested and approved by the Commission in advance, in accordance with paragraph 11 of the Commission's Project Review Fee schedule (Resolution No. 2009-2), the docket holder is responsible for timely submittal of a docket renewal application on the appropriate DRBC application form at least 12 months in advance of the docket expiration date set forth below. The docket holder will be subject to late charges in the event of untimely submittal of its renewal application, whether or not DRBC issues a reminder notice in advance of the deadline or the docket holder receives such notice. In the event that a timely and complete application for renewal has been submitted and the DRBC is unable, through no fault of the docket holder, to reissue the docket before the expiration date below (or the later date established by an extension that has been timely requested and approved), the terms and conditions of the current docket will remain fully effective and enforceable against the docket holder pending the grant or denial of the application for docket approval.

s. The Executive Director may modify or suspend this approval or any condition thereof, or require mitigating measures pending additional review, if in the Executive Director's judgment such modification or suspension is required to protect the water resources of the Basin.

t. Any person who objects to a docket decision by the Commission may request a hearing in accordance with Article 6 of the Rules of Practice and Procedure. In accordance with Section 15.1(p) of the Delaware River Basin Compact, cases and controversies arising under the Compact are reviewable in the United States district courts.

u. The docket holder may request of the Executive Director in writing the substitution of specific conductance for TDS. The request should include information that supports the effluent specific correlation between TDS and specific conductance. Upon review, the Executive Director may modify the docket to allow the substitution of specific conductance for TDS monitoring.

v. The docket holder is prohibited from treating/pre-treating any hydraulic fracturing wastewater from sources in or out of the Basin at this time. Should the docket holder wish to treat/pre-treat hydraulic fracturing wastewater in the future, the docket holder will need to first apply to the Commission to renew this docket and be issued a revised docket allowing such treatment and an expanded service area. Failure to obtain this approval prior to treatment/pre-treatment will result in action by the Commission.

w. Nothing in this docket constitutes a defense to any penalty action for past conduct of the docket holder or ongoing activity not authorized by this approval. In particular, renewal of this docket does not resolve violations – whether in the past or continuing – of provisions of the Delaware River Basin Compact ("Compact") or any rule, regulation, order or approval duly issued by the Commission or the Executive Director pursuant to the Compact. The Commission reserves its right to take appropriate enforcement action against the docket holder, including but not limited to recovery of financial penalties consistent with Section 14.17 of the Compact, for any and all such prior or continuing violations.

x. Upon submitting an application to the DRBC for renewal of this docket approval (See DECISION Condition II.r. above), the docket holder is required to submit a TDS Questionnaire if the docket holder requests to continue a TDS variance to the Commission's basin-wide 1,000 mg/l TDS limit for the IWTP discharge.

BY THE COMMISSION

DATE APPROVED:

EXPIRATION DATE: December 31, 2015